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20 Attorneys for Plaintiff  
21 Shamaneen Khan

22 UNITED STATES DISTRICT COURT  
23 NORTHERN DISTRICT OF CALIFORNIA

24 SHAMANEEN KHAN ) No. C08-01783 WHA  
25 Plaintiff, )  
26 v. ) STIPULATION AND [PROPOSED]  
27 THE PERMANENTE MEDICAL GROUP, ) ORDER CHANGING THE HEARING  
28 INCORPORATED, a California Corporation; ) DATE FOR DEFENDANT'S SEIU,  
29 SEIU UNITED HELATHCARE WORKERS -- ) UNITED HEALTHCARE WORKERS –  
30 WEST, a California Corporation and DOES 1- ) WEST'S MOTION TO DISMISS AND  
31 50, INCLUSIVE, ) SETTING BRIEFING SCHEULE  
32 Defendants. ) [FED.R.CIV.PROC. 12 (B)(6)]  
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35 Counsel for the Parties, by and through their respective counsel of record, hereby stipulate  
36 and agree as follows:

37 WHEREAS, on or about March 7, 2008, Plaintiff filed a Complaint for Damages Based on  
38 Religious Discrimination, (Failure to Accommodate), Wrongful Termination in Violation of Public

1 Policy and Infliction of Emotional Distress against Defendants in the Superior Court of the State of  
 2 California, for the County of Alameda, Case No. HG08375316;

3 WHEREAS, on or about April 3, 2008, Defendant SEIU, United Healthcare Workers –  
 4 West (“UHW”) filed a Notice of Removal;

5 WHEREAS, on or about April 8, 2008, Defendant UHW filed a Motion to Dismiss under  
 6 Rule 12(b)(6) of the Federal Rules of Civil Procedure, which is set to be heard on May 29, 2008 at  
 7 8 a.m. before the Honorable William H. Alsup;

8 WHEREAS, on or about May 5, 2008, Plaintiff filed a Notice of Motion and Motion for  
 9 Remand and Opposition to Defendant UHW’s Motion to Dismiss;

10 WHEREAS, Plaintiff’s Motion for Remand is currently scheduled for June 19, 2008 at 8  
 11 a.m. before the Honorable William H. Alsup;

12 WHEREAS, it best serves the interests of judicial economy to establish a coordinated  
 13 briefing schedule and common hearing date for UHW’s Motion to Dismiss and Plaintiff’s Motion  
 14 for Remand;

15 NOW, THEREFORE, the parties hereby stipulate and agree as follows:

16 1. The hearing on UHW’s Motion to Dismiss currently scheduled for hearing on May  
 17 29, 2008, and Plaintiff’s Motion for Remand is hereby continued to **June 19, 2008**.

18 2. UHW shall file a combined Reply in support of its Motion to Dismiss and  
 19 Opposition to Motion for Remand on or before **May 29, 2008**.

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1 3. Plaintiff shall file a Reply in support of its Motion for Remand on or before June 5, 2008.  
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3 Dated: May 8, 2008  
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WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

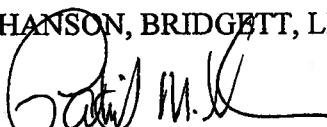
5 By: Bruce A. Harland  
6

7 WILLIAM A. SOKOL  
8 BRUCE A. HARLAND  
Attorneys for Defendant  
SEIU, United Healthcare Workers – West  
FRANKLIN EMPLOYMENT LAW GROUP

9 Dated: May \_\_\_, 2008  
10

11 By: Eugene T. Franklin  
12 BARBARA F. GREEN  
13 Attorneys for Plaintiff  
Shamaneen Khan

14 Dated: May 8, 2008  
15

16 By:   
17 HANSON, BRIDGETT, LLP  
18 PATRICK M. GLENN  
19 Attorneys for Defendant  
20 The Permanente Medical Group

21 Pursuant to the Stipulation of the Parties, and GOOD CAUSE, appearing, IT IS SO  
22 ORDERED.

23 Dated: May \_\_\_, 2008  
24

25 By: HON. WILLIAM H. ALSUP  
26 UNITED STATES DISTRICT JUDGE  
27

1 3. Plaintiff shall file a Reply in support of its Motion for Remand on or before **June 5, 2008**.  
2

3 Dated: May 8, 2008  
4

5 WEINBERG, ROGER & ROSENFELD  
6 A Professional Corporation  
7

8 By: \_\_\_\_\_  
9

10 WILLIAM A. SOKOL  
11 BRUCE A. HARLAND  
12 Attorneys for Defendant  
13 SEIU, United Healthcare Workers – West  
14 FRANKLIN EMPLOYMENT LAW GROUP  
15

16 Dated: May 8, 2008  
17

18 By: \_\_\_\_\_  
19

20 EUGENE T. FRANKLIN  
21 BARBARA F. GREEN  
22 Attorneys for Plaintiff  
23 Shamaneen Khan  
24

25 Dated: May \_\_\_, 2008  
26

27 HANSON, BRIDGETT, LLP  
28

29 By: \_\_\_\_\_  
30

31 PATRICK M. GLENN  
32 Attorneys for Defendant  
33 The Permanente Medical Group  
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35 Pursuant to the Stipulation of the Parties, and GOOD CAUSE, appearing, IT IS SO  
36 ORDERED.  
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38 Dated: May 12, 2008  
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40 By: \_\_\_\_\_  
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42 HON. WILLIAM H. ALSUP  
43 UNITED STATES DISTRICT JUDGE  
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